

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X
IYANNA DAVIS

Plaintiff,

-against-

COUNTY OF NASSAU, NASSAU COUNTY
POLICE OFFICER MICHAEL CAPOBIANCO,
Serial #6971, SGT HERMANN, POLICE OFFICER
CARL CAMPBELL, POLICE OFFICER DWIGHT
BLANKENSHIP, POLICE OFFICER JOSEPH
GRELLA, POLICE OFFICER JOHN DOES #1-5,
NASSAU COUNTY DISTRICT ATTORNEY'S
OFFICE INVESTIGATOR THOMAS BIDELE,
NASSAU COUNTY DISTRICT ATTORNEY'S
OFFICE INVESTIGATORS JOHN DOES #2-5,
NASSAU COUNTY ASSISTANT DISTRICT
ATTORNEY JOHN DOES #1-5.

Defendants.
-----X

**DOCKET NO.: 11-CV-0076
(LDW)**

**PROPOSED JOINT
PRETRIAL ORDER**

I.

The caption is accurately set forth above.

II.

Plaintiff's Trial Counsel

Charles Horn
Friedman Harfenist Kraut & Perlstein
3000 Marcus Avenue Suite 2E1
Lake Success, New York 11042
(516)355-9600(p)
(516)355-9638(f)

Christian Aaron Pickney
The Pickney Law Firm
190 Willis Avenue Suite 112
Mineola New York 11501
(516)565-5555
(516)485-1805 (f)

County Defendants' Trial Counsel

Deputy County Attorney Diane C. Petillo
Office of the Nassau County Attorney
One West Street
Mineola, New York 11501
(516) 571-6190 (p)
(516) 571-3058 (f)

Deputy County Attorney Thomas Lai
(516) 571-6074 (p)
(516) 571-3058 (f)

III.

The Plaintiff requests a trial by jury and estimates that the complete presentation of evidence by both sides will necessitate two weeks of trial.

IV.

Plaintiff's Witnesses:

1. Iyanna Davis, Plaintiff can be contacted through counsel
2. Michael Capobianco, 1490 Franklin Avenue Mineola, NY 11501
3. Thomas Bidell, 262 Old Country Road Mineola, NY 11501
4. Joseph Grella, 1490 Franklin Avenue Mineola, NY 11501
5. Dwight Blankenship, 1490 Franklin Avenue Mineola, NY 11501
6. SGT Hermann, 1490 Franklin Avenue Mineola, NY 11501
7. Carl Campbell, 1490 Franklin Avenue Mineola, NY 11501
8. Steven I. Becker, M.D. 33-00 Broadway Suite 204 Fairlawn, NJ 07410
9. Joel J. Wallack, M.D. 10 Union Street Square East New York, NY 10003
10. Det. Vacchano, 1490 Franklin Avenue Mineola, NY 11501
11. P.O John LaSala, 1490 Franklin Avenue Mineola, NY 11501
12. P.O Theodore Hughes, 1490 Franklin Avenue Mineola, NY 11501
13. P.O Carl Campbell, 1490 Franklin Avenue Mineola, NY 11501
14. P.O Michael Capobianco, 1490 Franklin Avenue Mineola, NY 11501
15. P.O Mario Mastopierro, 1490 Franklin Avenue Mineola, NY 11501
16. P.O Dwight Blankenship, 1490 Franklin Avenue Mineola, NY 11501
17. P.O Joseph Grella, 1490 Franklin Avenue Mineola, NY 11501
18. Sgt. Hermann, 1490 Franklin Avenue Mineola, NY 11501
19. P.O Kevin Hibie, 1490 Franklin Avenue Mineola, NY 11501
20. P.O Officer Frank Leckler, 1490 Franklin Avenue Mineola, NY 11501
21. P.O Officer DiScala, 1490 Franklin Avenue Mineola, NY 11501
22. A.M.T. Michael Seltzer, 1490 Franklin Avenue Mineola, NY 11501
23. A.M.T. Kris Kalendar, 1490 Franklin Avenue Mineola, NY 11501
24. A.M.T. Larry Loiselle, 1490 Franklin Avenue Mineola, NY 11501
25. Police Officer Mark Aurricchio, 1490 Franklin Avenue Mineola, NY 11501
26. Police Officer Paul Behr, 1490 Franklin Avenue Mineola, NY 11501

27. Police Officer Carlos Flores, 1490 Franklin Avenue Mineola, NY 11501
28. Lieutenant Anthony Campagna, 1490 Franklin Avenue Mineola, NY 11501
29. Police Officer Jimmy Brown, 1490 Franklin Avenue Mineola, NY 11501
30. Nadine Doleyres Comprehensive Counseling 128 N. Village Rockville Centre, NY 11570
31. Elouise Hall, 31 LaFayette Avenue Hempstead, NY
32. Linda Bruh, 128 N. Village Rockville Centre, NY 11570
33. Dina Blue, 11 Rottkamp Street Valley Stream, New York 11580
34. Detective Christopher Ferro, 1490 Franklin Avenue, Mineola New York 11501
35. Oleg Isakov, M.D., 98-120 Queens Boulevard, Suite 1C, Rego Park, NY 11374
36. Reginald Lecator, 31 Lafayette Avenue Hempstead New York
37. Teresa Thompkins, 31 Lafayette Avenue Hempstead New York
38. Joanna Little, 31 Lafayette Avenue Hempstead, New York
39. Roshandra Lecator, 31 Lafayette Avenue Hempstead, New York
40. NCD AO Investigator Walsh, 262 Old Country Road Mineola, NY 11501
41. NCD AO Investigator Maher, 262 Old Country Road Mineola, NY 11501
42. Detective Torreville, 262 Old Country Road Mineola, NY 11501
43. Detective Schurmann, 262 Old Country Road Mineola, NY 11501

County Defendants' Witnesses:

1. Iyanna Davis, Plaintiff can be contacted through her counsel
2. Police Officer Michael Capobianco, 1490 Franklin Avenue Mineola, NY 11501
3. NCD AO Investigator Thomas Bidell, 262 Old Country Road Mineola, NY 11501
4. Police Officer Joseph Grella, 1490 Franklin Avenue Mineola, NY 11501
5. Police Officer Dwight Blankenship, 1490 Franklin Avenue Mineola, NY 11501
6. Sgt. John Hermann, 1490 Franklin Avenue Mineola, NY 11501
7. Police Officer Carl Campbell, 1490 Franklin Avenue Mineola, NY 11501
8. Detective Vacchano, 1490 Franklin Avenue Mineola, NY 11501
9. Police Officer John LaSala, 1490 Franklin Avenue Mineola, NY 11501
10. Police Officer Theodore Hughes, 1490 Franklin Avenue Mineola, NY 11501
11. Police Officer Mario Mastopierro, 1490 Franklin Avenue Mineola, NY 11501
12. Police Officer Kevin Hibie, 1490 Franklin Avenue Mineola, NY 11501
13. Police Officer Officer Frank Leckler, 1490 Franklin Avenue Mineola, NY 11501
14. Police Officer Officer DiScala, 1490 Franklin Avenue Mineola, NY 11501
15. A.M.T. Michael Seltzer, 1490 Franklin Avenue Mineola, NY 11501
16. A.M.T. Kris Kalendar, 1490 Franklin Avenue Mineola, NY 11501
17. A.M.T. Larry Loiselle, 1490 Franklin Avenue Mineola, NY 11501
18. Police Officer Mark Aurricchio, 1490 Franklin Avenue Mineola, NY 11501
19. Police Officer Paul Behr, 1490 Franklin Avenue Mineola, NY 11501
20. Police Officer Carlos Flores, 1490 Franklin Avenue Mineola, NY 11501
21. Lieutenant Anthony Campagna, 1490 Franklin Avenue Mineola, NY 11501
22. Police Officer Jimmy Brown, 1490 Franklin Avenue Mineola, NY 11501
23. Joanna Little, 31 Lafayette Avenue, Hempstead, NY
24. Elouise Hall, 31 Lafayette Avenue, Hempstead, NY
25. Detective Christopher Ferro, 1490 Franklin Avenue, Mineola New York 11501
26. NCD AO William Walsh, 262 Old Country Road, Mineola, NY 11501

27. NCD AO Thomas Maher, 262 Old Country Road, Mineola, NY 11501

Defendants' Expert Witness:

Michael Melamed, M.D.
11 Jodi Court
Glen Cove, New York 11542

V.

Party designation of deposition testimony

Plaintiff	Defendant
X	P.O. Michael Capobianco
X	District Attorney Investigator Thomas Bidell
X	P.O. Joseph Grella
X	P.O. Dwight Blankenship
X	P.O. Carl Campbell
X	District Attorney Investigator Maher
X	District Attorney Investigator Walsh
X	Nassau County Homicide Detective Ferro
	X Iyanna Davis for impeachment purposes
	X Joel Wallack, MD for impeachment purposes or in the event of his unavailability at trial

VI.

Plaintiff Exhibits*

Objection	Description of Exhibit
Auth. Admis.	
___	1. NCD AO Video of 31 Lafayette Ave Hempstead NY
___	2. NCD AO Crime Scene Photos (32 photos)
___	3. Audio Statement of Joanna Little dated 5/13/10
___	4. Audio Statement of Elouise Hall 5/13/10
___	5. Audio Statement of Iyanna Davis 6/28/10
___	6. NCPD Standards of Conduct (bate stamped 81-82)
___	7. NCPD Lesson Plan (bate stamped 83-92)
___	8. NCPD Lesson Plan (bate stamped 93-101)
___	9. NCPD Academy Lesson Plan (bate stamped 102-127)
___	10. NCPD Morning Report 5/13/10 (bate stamped 000001)
___	11. NCPD Case Report (bate stamped 2-6)
___	12. NCPD Crime Scene Report (bate stamped 7-9)
___	13. NCPD Property Bureau Invoice (bate stamped 10-12)
___	14. NCPD Forensic Evidence Bureau Receipt/Report (bate # 13)
___	15. NCPD Firearms Discharge Report (bate #14-17)
<u>X</u>	<u>X</u> 16. Letter from David Galison

<u>X</u>	<u>X</u>	17.	Schematic of Second Floor Apartment (bate stamped 28)
<u> </u>	<u> </u>	18.	NCPD Event Search (bate stamped 29-31)
<u> </u>	<u> </u>	19.	NCPD Background Event Chronology (bate stamped 32-33)
<u> </u>	<u> </u>	20.	NCPD Unit Information (bate stamped 34)
<u> </u>	<u> </u>	21.	Statement of Det. Vacchano (bate stamped 35-36)
<u> </u>	<u> </u>	22.	Statement of P.O John LaSala (bate stamped 38-39)
<u> </u>	<u> </u>	23.	Statement of P.O Theodore Hughes (bate stamped 39-41)
<u> </u>	<u> </u>	24.	Statement of P.O Carl Campbell (bate stamped 41-42)
<u> </u>	<u> </u>	25.	Statement of P.O Michael Capobainco (bate stamped 42-44)
<u> </u>	<u> </u>	26.	Statement of P.O Mario Mastopierro (bate stamped 44-45)
<u> </u>	<u> </u>	27.	Statement of P.O Dwight Blankenship (bate stamped 45-47)
<u> </u>	<u> </u>	28.	Statement of P.O Joseph Grella (bate stamped 47-48)
<u> </u>	<u> </u>	29.	Statement of Sgt. Hermann (bate stamped 49-50)
<u> </u>	<u> </u>	30.	Statement of P.O Kevin Hibie (bate stamped 51-52)
<u> </u>	<u> </u>	31.	Statement of P.O Officer Frank Leckler (bate stamped 52-54)
<u> </u>	<u> </u>	32.	Statement of P.O Officer DisCala (bate stamped 54-56)
<u> </u>	<u> </u>	33.	Statement of A.M.T. Michael Seltzer (bate stamped 56-57)
<u> </u>	<u> </u>	34.	Statement of A.M.T. Kris Kalendar (bate stamped 57-58)
<u> </u>	<u> </u>	35.	Interview of A.M.T. Larry Loiselle (bate stamped 58-59)
<u> </u>	<u> </u>	36.	Statement of Police Officer Mark Aurrichio (bate stamped 59-60)
<u> </u>	<u> </u>	37.	Statement of Police Officer Paul Behr (bate stamped 60-61)
<u> </u>	<u> </u>	38.	Statement of Police Officer Carlos Flores (bate stamped 61-62)
<u> </u>	<u> </u>	39.	Statement of Lieutenant Anthony Campagna (bate stamped 64-66)
<u> </u>	<u> </u>	40.	Statement of Police Officer Jimmy Brown (bate stamped 66-67)
<u> </u>	<u> </u>	41.	NCPD Deadly Force Response Team procedure (bate stamped 75-80)
<u>X</u>	<u>X</u>	42.	Medical Records from Nadine Doleyres
<u>X</u>	<u>X</u>	43.	Mercy Medical Center Medical Records
<u>X</u>	<u>X</u>	44.	Nassau County University Medical Center Records
<u> </u>	<u> </u>	45.	Audio Statement of Elouise Hall 5/13/10
<u> </u>	<u> </u>	46.	Audio Statement of Iyanna Davis 6/28/10
<u> </u>	<u> </u>	47.	NCPD Standards of Conduct (bate stamped 81-82)
<u> </u>	<u> </u>	48.	NCPD Lesson Plan (bate stamped 83-92)
<u> </u>	<u> </u>	49.	NCPD Lesson Plan (bate stamped 93-101)
<u> </u>	<u> </u>	50.	NCPD Academy Lesson Plan (bate stamped 102-127)
<u> </u>	<u> </u>	51.	NCPD Morning Report 5/13/10 (bate stamped 000001)
<u>X</u>	<u>X</u>	52.	Expert Report and supporting documentation of Steven I. Becker, M.D.
<u>X</u>	<u>X</u>	53.	Expert Report and supporting documentation of Joel J. Wallack, M.D.
<u>X</u>	<u>X</u>	54.	The R-4 which P.O. Capobianco discharged on May 13, 2010
<u> </u>	<u> </u>	55.	Photos of the clothing worn by Iyanna Davis on May 13, 2010
<u> </u>	<u> </u>	56.	Photos of 31 LaFayette Avenue Hempstead New York
<u> </u>	<u> </u>	57.	The ammunition carried by P.O. Capobianco on May 13, 2010
<u>X</u>	<u>X</u>	58.	Bullet fragments from the plaintiff wounds
<u>X</u>	<u>X</u>	59.	Photos depicting the wounds of Plaintiff.
<u> </u>	<u> </u>	60.	Documents bate stamped 000018-000019 (claimed privileged)
<u> </u>	<u> </u>	61.	Documents bate stamped 000068-000074 (claimed privileged)
<u> </u>	<u> </u>	62.	Photocopies of Photos of Plaintiff and her home

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|---------------|---------------|-------|---|
| <u> X </u> | <u> X </u> | 63. | Medical Records of Iyanna Davis |
| <u> </u> | <u> </u> | 64.** | The arrest folder maintained by the Nassau County District Attorney's Office regarding the arrests that occurred at 31 Lafayette Avenue Hempstead New York on May 13, 2010. |
| <u> </u> | <u> </u> | 65.** | All video recordings generated by the Nassau County District Attorney's Office Investigation Bureau in relation to and/or depicting the interior or exterior of 31 Lafayette Avenue Hempstead New York on or about January 1, 2010 thru May 30, 2010. |
| <u> </u> | <u> </u> | 66.** | All audio recordings generated by the Nassau County District Attorney's Office Investigation Bureau in relation to and/or reflecting any conversations inside or on the property 31 Lafayette Avenue Hempstead, New York on or about January 1, 2010 thru May 30, 2010. |
| <u> </u> | <u> </u> | 67.** | All materials submitted to furtherance of securing a search warrant for 31 Lafayette Avenue Hempstead New York on or about May 2010. |
| <u> </u> | <u> </u> | 68.** | All radio transmissions for the morning of May 13, 2010 in regards to the execution of the warrant at 31 Lafayette Avenue Hempstead, New York. |
| <u> </u> | <u> </u> | 69.** | Any documents generated prior to or as a result of the entry of Thomas Bidell into 31 Lafayette Avenue on or about May 10, 2010. |
| <u> </u> | <u> </u> | 70.** | A copy of all computer research performed of the Nassau County District Attorney's Office Investigations Bureau regarding 31 Lafayette Avenue Hempstead, New York. |
| <u> </u> | <u> </u> | 71.** | All photos and film provided by the Nassau County District Attorney's Office to the Bureau of Special Operations prior to the execution of the search warrant at 31 Lafayette Avenue Hempstead, New York. |
| <u> </u> | <u> </u> | 72.** | All documents provided by the Nassau County District Attorney's Office to the Bureau of Special Operations prior to the execution of the search warrant at 31 Lafayette Avenue Hempstead, New York. |
| <u> </u> | <u> </u> | 73.** | Any documents generated as a result of the confidential informant insertion into 31 Lafayette Avenue Hempstead New York on or about May 10, 2010. |
| <u> X </u> | <u> X </u> | 74. | Medicaid Lien |
| <u> X </u> | <u> X </u> | 75. | Notice of Claim |

** Plaintiff was only informed same were sealed on April 26, 2012 and therefore was unable to secure them prior to the submission of the pre-trial order.

* County Defendants object to all of the above listed Plaintiff's exhibits on the grounds of Privilege, Authenticity, Hearsay, and Relevance or other evidentiary grounds.

* County Defendants object "Letter from David Galison," #16 — this designation is vague, overly broad and provides the County Defendants with no notice as to what this "letter" may be. Further it is unclear from this designation as to whether this document was in fact produced during discovery.

* County Defendants object to "the R-4 which P.O. Capobianco discharged on May 13, 2010", #54, as this item has not been demanded, nor produced during discovery and upon

information and belief is not in the possession of the County Defendants.

These exhibits are listed as possible exhibits and the presence on this list does not necessarily represent that the plaintiff intends to introduce same into evidence.

* County Defendants object to the photos depicting the wounds of Plaintiff as referenced in #59 on the basis of Authenticity, Hearsay, overly prejudicial and cumulative.

* County Defendants object to the photographs of Plaintiff and her home as referenced in #62 on the basis of Authenticity, Hearsay, overly prejudicial and cumulative.

* County Defendants object to "the ammunition carried by P.O. Capobianco on May 13, 2012", #57, as this item has not been demanded, nor produced during discovery and is not in the possession of the Defendants.

** County Defendants object to the inclusion of #'s 64-73 in the Pre-Trial Order as the above documents are sealed and not under the jurisdiction of this Court.

County Defendants' Exhibits:

Defendants may offer the following exhibits in their case in chief (as well as exhibits identified by Plaintiff, regardless of whether Plaintiff introduces said exhibit(s)).

Note: the order that the exhibits appear in for purposes of this document is not necessarily the order that the exhibits will appear in at the time of trial.

Objection			Description of Exhibit
Auth.	Admis.		
_____	_____	A.	Second Amended Complaint filed May 2, 2012, DE 25;
_____	_____	B.	Answer to Plaintiff's Second Amended Complaint filed May 7, 2012;
_____	_____	C.	NCD AO Video of 31 Lafayette Ave Hempstead NY;
_____	_____	D.	NCD AO Crime Scene Photos (32 photos);
_____	_____	E.	Audio Statement of Joanna Little dated 5/13/10;
_____	_____	F.	Audio Statement of Elouise Hall 5/13/10;
_____	_____	G.	Audio Statement of Iyanna Davis 6/28/10;
_____	_____	H.	NCPD Standards of Conduct (Bate stamped 81-82);
_____	_____	I.	NCPD Lesson Plan (Bate stamped 83-92);
_____	_____	J.	NCPD Lesson Plan (Bate stamped 93-101);
_____	_____	K.	NCPD Academy Lesson Plan (Bate stamped 102-127);
_____	_____	L.	NCPD Morning Report 5/13/10 (Bate stamped 000001);
_____	_____	M.	NCPD Case Report (Bate stamped 000002-000006);
_____	_____	N.	NCPD Crime Scene Examination Report (Bate stamped 000007-000009);
_____	_____	O.	NCPD Property Bureau Invoice (Bate stamped 10-12);
_____	_____	P.	NCPD Forensic Evidence Bureau Receipt/Report (Bate stamped 13);
_____	_____	Q.	NCPD Firearms Discharge Report (Bate stamp 14-17);
_____	_____	R.	Search Warrant Order dated May 5, 2010, signed by Hon. Steven Jaeger (Bate stamp 000021-000023);

_____	S.	Schematic of Second Floor Apartment (Bate stamped 28);
_____	T.	NCPD Event Search (Bate stamped 29-31);
_____	U.	NCPD Background Event Chronology (Bate stamped 32-33);
_____	V.	NCPD Unit Information (Bate stamped 34);
_____	W.	Statement of Elouise Hall (Bate stamped 35, 37-38);
_____	X.	Statement of Joanna Little (Bate stamp 36-37);
_____	Y.	Statement of Police Officer John LaSala (Bate stamped 38-39);
_____	Z.	Statement of Police Officer Theodore Hughes (Bate stamped 39-41);
_____	AA.	Statement of Police Officer Carl Campbell (Bate stamped 41-42);
_____	BB.	Statement of Police Officer Michael Capobainco (Bate stamped 42-44);
_____	CC.	Statement of Police Officer Mario Mastopierro (Bate stamped 44-45);
_____	DD.	Statement of Police Officer Dwight Blankenship (Bate stamped 45-47);
_____	EE.	Statement of Police Officer Joseph Grella (Bate stamped 47-48);
_____	FF.	Statement of Sgt. Hermann (Bate stamped 49-50)
_____	GG.	Statement of Police Officer Kevin Hibie (Bate stamped 51-52)
_____	HH.	Statement of Police Officer Frank Leckler (Bate stamped 52-54)
_____	II.	Statement of Police Officer DisCala (Bate stamped 54-56)
_____	JJ.	Statement of A.M.T. Michael Seltzer (Bate stamped 56-57)
_____	KK.	Statement of A.M.T. Kris Kalendar (Bate stamped 57-58)
_____	LL.	Interview of A.M.T. Larry Loiselle (Bate stamped 58-59)
_____	MM.	Statement of Police Officer Mark Aurrichio (Bate stamped 59-60)
_____	NN.	Statement of Police Officer Paul Behr (Bate stamped 60-61)
_____	OO.	Statement of Police Officer Carlos Flores (Bate stamped 61-62)
_____	PP.	Statement of Lieutenant Anthony Campagna (Bate stamped 64-66)
_____	QQ.	Statement of Police Officer Jimmy Brown (Bate stamped 66-67)
_____	RR.	NCPD Deadly Force Response Team procedure (Bate stamped 75-80)
_____	SS.	Statement of Iyanna Davis aka "Natasha Little" (Bate stamp 000062-000064).
_____	TT.	File of Det. Ferro regarding investigation of incident at 31 Lafayette Avenue (Bate stamp 000128-000162).
_____	UU.	Nassau University Medical Center (NUMC) records (Bate stamped NUMC 1-404)
_____	VV.	Mercy Hospital Medical Center (Bate stamped 405-408)
_____	WW.	Dr. Wendy Kinzler of Women's Contemporary Care Associates (Bate stamped 409-534).
_____	XX.	Records maintained by Winthrop University Hospital
_____	YY.	Records maintained by 'A' Comprehensive Counseling Center

Plaintiff stipulates to the authenticity of all the above marked exhibits but reserves the right to object to same at the time of trial based on relevancy or other evidentiary grounds.

These exhibits are listed as possible exhibits and the presence on this list does not necessarily represent that County Defendants' intend to introduce same into evidence.

Both parties reserve the right to offer any exhibit listed on either County Defendants' or Plaintiff's exhibit list in their case in chief.

Note: the order that the exhibits appear in for purposes of this document is not necessarily the order that the exhibits will appear in at the time of trial.

RESERVATION OF RIGHTS

Subject to the ruling of this court, Plaintiff and County Defendants, by and through counsel, reserve their respective rights to amend and to supplement this Pre-Trial Order.

Subject to the ruling of this Court, Plaintiff and County Defendants reserve the right to use any relevant and admissible exhibit identified by Plaintiffs or County Defendants' exhibits list whether or not the Plaintiff's or County Defendants' actually offer such exhibit at the time of trial.

Subject to the ruling of this Court, Plaintiff and County Defendants reserve the right to object to any of Plaintiffs or County Defendants' exhibits which have not been provided to either party.

Subject to the ruling of this Court, Plaintiff and County Defendants respectfully reserve the right to offer for evidence any items, information and documents obtained pursuant to subpoena.

Subject to the ruling of this Court, Plaintiff and County Defendants additionally reserve the right to object to Plaintiff's or County Defendants' exhibits based on relevancy or other evidentiary grounds.

Respectfully Submitted,

By: s/
Counsel for Plaintiff
Charles Horn
Friedman Harfenist Kraut & Perlstein
3000 Marcus Avenue Suite 2E1
Lake Success, New York 11042
(516)355-9600

By: /dcp/ /tl/
Counsel for County Defendants
Diane C. Petillo
Thomas Lai
Office of the Nassau County Attorney
One West Street
Mineola, New York 11501
(516)571-3056